

MEMORANDUM

TO: Rick Crume, U.S. Environmental Protection Agency

FROM: Susan Radomski, Eastern Research Group

DATE: November 11, 1997

SUBJECT: Summary of October 28, 1997, Incinerator Work Group Meeting

1.0 INTRODUCTION AND PURPOSE OF MEETING

The October 28 meeting was the thirteenth meeting of the Incinerator Work Group for the Industrial Combustion Coordinated Rulemaking (ICCR). The major goals of this meeting included reviewing and approving draft subcategory definitions and preparing the presentation for the November Coordinating Committee meeting. Other goals included updating the table of subcategories and the Work Group schedule.

2.0 LOCATION AND DATE

This Work Group meeting was held from 8:30 am until 4:00 pm on October 28, 1997, at the Environmental Research Center in Research Triangle Park, North Carolina. A copy of the draft meeting agenda is included as attachment 1.

3.0 ATTENDERS

The Incinerator Work Group meeting was open to the public. Participants at the meeting included representatives of the EPA, industry, State and local governments, and the environmental community. A copy of the attendance list for the meeting is included as attachment 2.

4.0 DISCUSSION

After introductions, the Work Group received an update about Work Group members with poor attendance records. Updates were also made on the Information Collection Request,

the Satisfaction Survey and the progress of the Solid Waste Definition Subgroup. The Work Group then discussed the need for the Work Group to develop a schedule to present to the Milestone Tracking Group and received guidance on developing a Regulatory Alternatives Paper (RAP). The Testing and Monitoring Protocol Work Group discussed possible assistance that can be provided to the Incinerator Work Group. The subteams discussed their subcategory presentations. These topics are summarized in the sections that follow.

4.1 General Updates

The updates mentioned above were provided by Rick Crume of EPA and Work Group members. These discussions are summarized below.

4.1.1 Incinerator Work Group Members with Poor Attendance Records

Rick Crume discussed the possibility of contacting Work Group members who have attended fewer than 50% of the Work Group activities. A sample letter for these members, as shown in attachment 3, was circulated for the Work Group to review. The letter requested that members who have attended less than half of the meetings contact the Work Group Co-chairs to discuss either increasing or ending their involvement with the Work Group.

4.1.2 Information Collection Request

Tom Waddell of Eastern Research Group discussed the Information Collection Request (ICR). Version 1 of the ICR Database was released on October 15 and is available on the TTN under the Information Collection heading. The current database may be used for a qualitative review of the available data. A new version of the ICR Database will be released in mid-December after identified errors are corrected.

4.1.3 Satisfaction Survey

Rick Crume outlined the responses to the Satisfaction Survey, which included such comments as slow progress, micromanagement by the Coordinating Committee and a need for further guidance from EPA. A meeting among EPA and Work Group representatives will be held on November 3 to discuss the surveys and methods to improve the process. The Incinerator Work Group will be represented by Rick Crume, John Huyler, Norman Morrow, Jeff Shumaker, Dick Van Frank and Scott Warner.

4.1.4 Solid Waste Definition Subgroup Progress

Jeff Shumaker and Dick Van Frank reported on the progress made by the Solid Waste Definition Subgroup. The Subgroup may need to send two different opinions to the Coordinating Committee unless consensus is reached at the next meeting. The Subgroup members have not yet agreed on a recommendation for the definition.

4.1.5 Milestone Tracking Subgroup

Norman Morrow gave an update on the forming of a Milestone Tracking Group to track the progress of the individual Work Groups. The subteams were asked to provide Norman Morrow with schedules and any updates.

4.2 Guidelines for Subteam Reports

Rick Crume made a presentation on preparing subteam reports for use by the EPA in writing a Regulatory Alternatives Paper. The full presentation is available as attachment 4. He outlined current and future Work Group tasks and methods for completing these tasks.

4.3 Subteam Status Reports

The subteams reviewed draft copies of the subcategory presentation which will be given at the November Coordinating Committee meeting. Each subteam provided a progress report to the Work Group after meeting individually to review the presentation and the progress they have made since the last meeting.

4.3.1 Subteam 5 Status Report

Subteam 5 outlined the information obtained from the Inventory and Emission Databases. Many of the devices listed as burning agricultural waste appeared to actually be burning wood and wood products. A member of another subteam mentioned that agricultural waste tends to be burnt in the fields or in boilers. Subteam 5 agreed to research the use of combustion in the Agricultural Industry before making any decisions about the Agricultural Subcategory.

The subteam discussed the lack of emission data for Small Municipal Waste Combustors. Also, very little permit information has been found for incinerators. However, many emission test reports have been made available for Landfill Gas Flares, which could be added to the Emission Test Database if the Work Group decides to make the subcategory a high priority.

A subteam member made an important point involving the development of a MACT floor. He mentioned that the MACT floor may be technology based, as well as being based on test data.

4.3.2 Subteam 4 Status Report

Subteam 4 discussed the possibility of combining their current subcategories. It was suggested that the Drum Reclaimer Subcategory and Parts Reclaimer Subcategory be combined into a single subcategory. However, the subteam believed that there are enough differences between the two unit types to justify keeping them in separate subcategories. However, the subteam pointed out that the Secondary Copper, Secondary Iron and Secondary Precious Metals Subcategory should all be included with the Scrap Metal Recovery Subcategory.

Norman Morrow asked the subteam to consider grouping the unit types that fall into the “Other” Subcategory into a single “Other” Subcategory for the entire Work Group. The subteam agreed to this, as did the Work Group.

4.3.3 Subteam 3 Status Report

Subteam 3 verified that they will continue research into subcategories after the presentation for the Coordinating Committee. For this reason, they requested that they not be held to working only with the information given in the presentation if better data become available at a later date. The subteam also discussed the definition of trench burners and stated that open field burning is exempt from the ICCR.

The subteam pointed out that the subcategory of Paper and Allied Products contains no clearly identifiable paper incinerators. For this reason, the Work Group agreed to include the subcategory with a comment that no such incinerators have yet been identified and the category has been deferred. In addition, the Treated Wood Wastes and Residues Subcategory has been combined with the Construction Demolition Subcategory, which will be handled by Subteam 3.

4.3.4 Subteam 2 Status Report

Subteam 2 agreed to the accuracy of the report to be given at the Coordinating Committee meeting and discussed the on-going efforts to analyze the available data on their subcategories.

4.3.5 Subteam 1 Status Report

Subteam 1 confirmed the accuracy of the information in the report to be given to the Coordinating Committee. The subteam has combined the Pathological and Crematory Subcategories into a single subcategory and handed the pharmaceutical units to Subteam 2.

4.4 Testing and Monitoring Protocol Work Group Discussion

Dennis Knisley of the Testing and Monitoring Protocol Work Group (T&MPWG) informed the Incinerator Work Group of the help provided to some of the other Work Groups. The T&MPWG has prepared preliminary lists of HAPs for several Work Groups and applicable HAP test methods.

In response to questions from Work Group members, Mr. Knisley explained that the criteria for each data search varied according to the needs of the Work Group for which it was performed. For that reason, the T&MPWG can include information on Section 129 pollutants in addition to HAPs for the Incinerator Work Group. The T&MPWG attempts to find data that have become available since the ICCR Inventory Database was developed. The final list of HAPs and other pollutants that the Work Group will consider is the responsibility of the Work Group. The T&MPWG merely offers preliminary lists and identifies additional data sources.

The Work Group agreed to allow the T&MPWG to find any additional sources of information that may be useful to the Incinerator Work Group. The T&MPWG may also offer guidance to help the Incinerator Work Group evaluate the quality of the information received and choose testing methods.

4.5 Planning of the Presentation for the November Coordinating Committee Meeting

The subteams suggested revisions to the package of draft subcategory definitions to be presented to the Coordinating Committee. Norman Morrow agreed to make the necessary corrections and have the package posted to the TTN prior to the Coordinating Committee Meeting. A Work Group member mentioned that the Work Group may not need time on the Coordinating Committee meeting schedule if the presentation is posted. However, Norman Morrow pointed out that the Coordinating Committee appreciates having a chance to ask

questions. The complete presentation is available on the TTN under the heading of Incinerator WG, Miscellaneous Download Area.

4.6 Future Work

Rick Crume discussed future Work Group goals. These goals include developing further understanding of subcategories through analysis of available data. In addition, the development of model plants will begin when ICR data become available. Rick Crume will present descriptions and examples of model plants at the next Work Group meeting.

The Work Group mentioned the possibility of inviting expert guests to meetings when a topic in the individual's area of knowledge is being discussed. In this way, the Work Group may obtain valuable advice from persons who would not otherwise be involved in the ICCR process.

5.0 ACTION ITEMS

The following action items are to be conducted by the next Work Group meeting:

- Subteam 5 will research the Agricultural Industry to find out if incineration is part of the industry standard or if composting, energy recovery or some other process is more generally used.
- Norm Morrow will update the packet of Work Group information for the November Coordinating committee meeting with any necessary changes and distribute it to the Subteam leaders for review. Once the information has been reviewed, he will submit it for posting to the TTN.
- Norm Morrow will give the Milestone Tracking Subgroup the list of milestone dates from each of the subteams.
- Rick Crume will prepare a presentation on model plants for the November 20 Work Group meeting.

6.0 IMPORTANT DATES

The current Work Group meeting schedule and other important dates are as follows:

- November 20: Work Group meeting scheduled for Houston, Texas (Note: the Coordinating Committee will meet on November 18 and 19)
- February 5: Work Group meeting tentatively scheduled for Orlando, Florida.

ATTACHMENTS

Attachment 1: Meeting Agenda

Attachment 2: Meeting Attenders

Attachment 3: Suggested E-mail Language for Non-Participating Members

Attachment 4: Guidelines for Subteam Reports

ATTACHMENT 1

Meeting Agenda

AGENDA
INCINERATOR WORK GROUP MEETING
October 28, 1997
8:30 am to 4:00 pm
EPA Environmental Research Center
Research Triangle Park, NC

MAJOR MEETING OBJECTIVES:

- Review and approve draft subcategory definitions and prepare presentation for November CC meeting in Houston
- Update the table of subcategories and schedule
- Discuss the next step(s)

AGENDA:

8:30 am Welcome -- Rick Crume
 Approval of agenda -- Scott Warner
 Review of meeting objectives -- Norm Morrow

8:40 am Updates

New members and representatives -- Rick Crume
ICR update -- Tom Waddell
Satisfaction survey summary -- Rick Crume
Waste definition update -- Jeff Shumaker
Milestone Tracking Subgroup table -- Norm Morrow
Other updates -- Rick Crume

9:00 am Guidelines for subteam reports -- Rick Crume & Norm Morrow

9:30 am BREAK AND SUBTEAM HUDDLES

10:45 am Subteam #1 report -- Paul Rahill

11:15 am Subteam #2 report -- Bob Morris

11:45 am LUNCH

1:00 pm Subteam #3 report -- Dave Maddox

1:30 pm Subteam #4 report -- Andy Roth

2:00 pm Subteam #5 report -- Rick Crume

2:30 pm BREAK

2:45 pm Planning of Houston presentation -- Norm Morrow

3:15 pm For discussion if time permits

Where do we go from here? -- Group
Satisfaction survey discussion -- Group
Subteam structure and participation -- Group
Dioxin presentation guidance -- Group

3:45 pm Wrap-up

Agenda for Houston meeting -- Norm Morrow
Meetings/teleconferences after Houston -- Group
Possible Glaxo incinerator tour -- Doug Finan

3:55 pm Flash minutes -- Susan Radomski

4:00 pm Adjourn -- Rick Crume

ATTACHMENT 2

Meeting Attenders

Meeting Attenders

| Name | Affiliation |
|----------------|---|
| Beth Berglund | Merck & Co, Inc. |
| Richard Crume | U.S. EPA/OAQPS |
| Jon Devine | U.S. EPA/OGC |
| Larry Faith | Shell Development Company |
| Doug Finan | Glaxo Wellcome, Inc. |
| John Huyler | The Keystone Center |
| Ruth Mahr | Citizens Concerned about Medical Waste Incineration |
| David Marrack | Galveston-Houston Assoc. for Smog Prevention |
| Bob Morris | The Coastal Corporation |
| Norman Morrow | Exxon Chemical Americas |
| Bill Perdue | Pulaski Furniture Corporation |
| Susan Radomski | Eastern Research Group, Inc. |
| Ed Repa | National Solid Waste Management Association |
| Andrew Roth | Regional Air Pollution Control Agency (Ohio) |
| Jeff Shumaker | International Paper |
| Dick Van Frank | National Audubon Society |
| Tom Waddell | Eastern Research Group, Inc. |
| Scott Warner | Eastern Research Group, Inc. |
| Ed Wheless | Los Angeles County Sanitation District |
| Bill Wiley | Consumat Systems, Inc. |

ATTACHMENT 3

Suggested E-Mail Language for Non-Participating Members

SUGGESTED E-MAIL LANGUAGE FOR NON-PARTICIPATING MEMBERS

(Please Mark Recommended Revisions)

As you know, the Industrial Combustion Coordinated Rulemaking (ICCR) process requires stakeholder participation in work group activities, including attending meetings. My records indicate that you have attended fewer than 50% of the Incinerator Work Group (IWG) meetings over the past year. I realize that business obligations and travel restrictions beyond your control may have limited your past involvement with the IWG. However, if you expect to be unable to participate in IWG activities in the future, we would like to remove your name from the IWG membership list to make room for others who can commit more time to the process. On the other hand, if you wish to stay involved, we would welcome your support. Please let me know if you will be able to attend future meeting and if there is anything we can do to help facilitate your participation. Feel free to contact Norm Morrow or me if you have any questions or wish to discuss this matter further. Thank you.

ATTACHMENT 4

Guidelines for Subteam Report

SUBCATEGORY DEFINITION OUTLINE

- Subcategory name
- Assigned CAA section; ICWI or OSWI
- Description of types of materials combusted
- General description of typical combustion devices
- Basis for subcategory bounds
- Other comments (e.g., HAPs)

CURRENT SUBCATEGORIES

1. Pathological/crematory
2. Pharmaceutical
3. Non-halogenated offgas
4. Halogenated offgas
5. Thermal treatment
6. Chemical and petroleum solids, liquids, and sludges
7. Wood
8. Demolition
9. Construction
10. Ovens
11. Drum reclaiming
12. Parts reclaiming
13. Scrap metal recovery
14. Unclassified burn-off ovens
15. Secondary copper
16. Secondary iron
17. Secondary precious metals
18. Small MWCs
19. Agricultural
20. Landfill gas flares
21. Other industrial/commercial waste

SUBCATEGORY MERGING

(Factors to Consider)

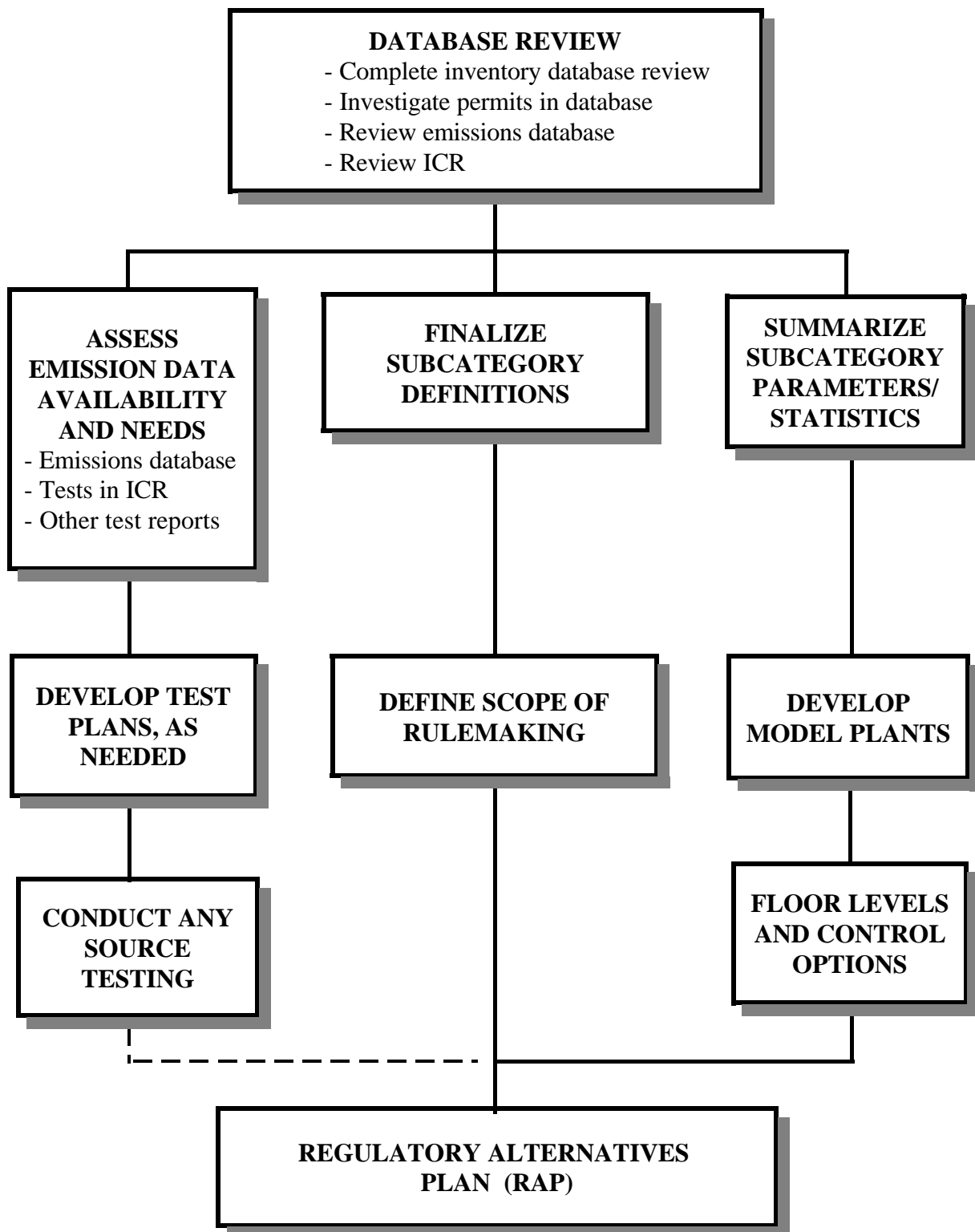
- Process operation
- Emission characteristics
- Applicability and costs of controls
- Potential for dilution of resulting standards
- (Are we going about this backwards?)

SETTING PRIORITIES

(Factors to Consider)

- Magnitude/type of emissions
- Potential emission reduction
- Number/location of facilities
- Clear, workable definitions
- Ease of regulation
- ICWI vs. OSWI
- Other?

WHERE DO WE GO FROM HERE?



IDEALIZED RULEMAKING STRUCTURE

(One of several possibilities)

